

BLANKROME

The Chrysler Building
405 Lexington Avenue | New York, NY 10174-0208
blankrome.com

Phone: (212) 885-5148
Fax: (917) 591-7897
Email: dsakel@blankrome.com

April 19, 2019

VIA EMAIL & ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court – S.D.N.Y.
500 Pearl Street, Room 750
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
No. 1:15-cv-05345 (AJN) (KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and write to respectfully request that the Court accept for filing under seal the enclosed letter-request for a pre-motion conference to address a motion for a protective order against, and to preclude late-produced documents by, the City of Almaty, Kazakhstan and BTA Bank JSC (together, “Almaty/BTA”).

As required by Rule III(d) of the Court’s Individual Practices, Triadou is submitting a version of its letter-request for a pre-motion conference with highlights reflecting proposed redactions, and will electronically file the proposed redacted version of its letter. Triadou is also submitting to this Court a sealed copy of the same.

Triadou respectfully requests that its letter-request be filed under seal because it references information provided in the April 17, 2019 letter submitted by Almaty/BTA for which they also sought sealing. It also references testimony and documents that were designated as “Confidential” by non-parties pursuant to the Stipulated Protective Order in this action. In accordance with this Court’s prior orders granting the sealing of information in connection with discovery-related motions, Triadou respectfully requests that its letter-request for a pre-motion conference filed under seal.

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel